

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

GRACE ESTABROOK, <i>et al.</i> ,)	
)	Case No. 1:25-cv-10281-WGY
Plaintiffs,)	
)	DECLARATION OF CARI
v.)	DAWSON IN SUPPORT OF
)	DEFENDANT NATIONAL
THE IVY LEAGUE COUNCIL OF)	COLLEGIATE ATHLETIC
PRESIDENTS, <i>et al.</i> ,)	ASSOCIATION’S MOTION TO
)	DISMISS
Defendants.)	

I, Cari Dawson, hereby declare:

1. I am counsel of record for National Collegiate Athletic Association (“NCAA”) in both this case and a case filed in the Northern District of Georgia styled *Gaines v. National Collegiate Athlete Association, et al.*, Case No. 1:24-cv-01109-TRJ.
2. The plaintiffs in the *Gaines* action filed their original complaint on March 14, 2024. A true copy of a relevant excerpt of that complaint is attached as Exhibit 1.
3. The NCAA and other defendants in the *Gaines* action moved to dismiss the *Gaines* complaint. Instead of opposing the motions to dismiss, the *Gaines* plaintiffs amended their complaint. A true copy of a relevant excerpt of that first amended complaint is attached as Exhibit 2.
4. The NCAA and other defendants in the *Gaines* action moved to dismiss the first amended complaint. Prior to those motions being heard, the *Gaines* plaintiffs sought and received leave to file a second amended complaint. A true copy of their second amended complaint (omitting appendices and exhibits) is attached as Exhibit 3.

5. The NCAA and other defendants in the *Gaines* action have pending motions to dismiss the second amended complaint.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on April 21, 2025.

/s/ Cari K. Dawson

Cari K. Dawson